

Southern Arizona VA Health Care System Psychology Internship Program

Application and Selection Procedures.....	2
Non-Discrimination Policy.....	4
Required Preparation, Experiences, and Eligibility.....	5
Administrative and Financial Assistance.....	9
Supervision Requirements.....	10
Record Maintenance.....	11
Successful Completion of Internship.....	12
Performance Evaluation Schedule.....	13
Internship Graduate Feedback Policy.....	14
Grievance Procedures.....	15
Due Process Policy.....	17

APPLICATION & SELECTION PROCEDURES

The deadline for receipt of completed application materials is Monday, **November 8, 2021**.

The following materials must be submitted:

- A completed APPIC Application for Predoctoral Psychology Internship (AAPI). The AAPI is available for completion at the APPIC Web site: www.appic.org. The APPIC Verification of Internship Eligibility needs to be verified by your Director of Clinical or Counseling Training. The AAPI should include:
 - A curriculum vitae.
 - Official transcripts of your graduate academic records.
 - Three letters of recommendation from faculty in your academic department or from practicing clinicians who know your work in psychology (e.g. externship agency, etc).

The Selection Process

- Upon receipt of an application, the Director of Training conducts a preliminary review for completeness. Intern selection is conducted by the entire training staff. The applicant is expected to have a strong theoretical background based upon the scientific foundation of clinical psychology. They are also expected to be able to communicate well in written and oral forms, have experience in individual and group therapies, and overall experiences that fit well with this VA medical center program. The training staff reviews applications and offers approximately 40 interviews. Applicants will be notified by Monday, **December 6th** whether they will be offered an interview or are unlikely to be in the pool of applicants who will be placed on the APPIC rank list for potential internship offers. For the 2022-2023 training year, interviews will be conducted via video teleconferencing in light of the pandemic. Interviews will be offered during December and early January. These interview times will include an overview of the program (with multiple applicants), interview with two staff members and a current intern. The interview will allow time for the applicant to get a good sense of the program and staff. This allows determination for a good fit for both applicant goals and the program's format. Accommodations will be made for applicants unable to attend the interview dates.

**SAVAHCS
Psychology Internship Program
Policies and Procedures
Revised September 2021**

Page 3 of 25

The internship strictly observes the guidelines regarding the computerized internship matching program adopted by APPIC and the Council of University Directors of Clinical and Counseling Programs. Please go to the APPIC website for the latest information about the application process, www.appic.org. For more information or clarification, contact the Director of Training at the above information.

For additional questions please contact the Director of Training:

Beth Zeiger, Ph.D.
Interim Psychology Training Director (4-116A)
Southern Arizona VA Health Care System
3601 S Sixth Ave
Tucson, AZ 85723
(520) 664-1831 ext 2-3401

Email: elizabeth.zeiger@va.gov

NON-DISCRIMINATION POLICY

The Southern Arizona VA Health Care System is an Equal Opportunity Employer. The Psychology Internship Program places a high value on diversity and encouraging cultural competency and cultural humility. We select and welcome candidates from a diverse group of geographic areas, background, and experiences. We place no conditions and avoid any actions that would restrict program access or completion on grounds irrelevant to success in graduate training or the profession of psychology.

REQUIRED PREPARATION, EXPERIENCES, AND ELIGIBILITY

Eligibility requirements for internship:

- Enrollment in good standing in a doctoral training program in clinical or counseling psychology accredited by the American Psychological Association or Canadian Psychological Association.
- Completion of at least three years of graduate study in psychology.
- Sufficient academic progress that completion of the doctorate degree within two years of the beginning of the internship is feasible in the opinion of the Director of Training.
- United States citizenship (see section below on **Eligibility Requirements for All VA Programs**).

Minimum Number of Hours at Time of Application:

- 500 hours of a combination of intervention and assessment hours (including proposed hours for current year)
- At least 5 integrated psychological reports with adults

The Southern Arizona VA Health Care System is an Equal Opportunity Employer. The Psychology Internship Program places a high value on diversity and encouraging cultural competency. We select and welcome candidates from a diverse group of geographic areas, background, and experiences.

Eligibility Requirements for All VA Programs

The Department of Veterans Affairs (VA) adheres to all Equal Employment Opportunity and Affirmative Action policies. As a Veterans Health Administration (VHA) Health Professions Trainee (HPT), you will receive a Federal appointment, and the following requirements will apply prior to that appointment

- **U.S. Citizenship.** HPTs who receive a direct stipend (pay) must be U.S. citizens. Trainees who are not VA paid (without compensation-WOC) who are not U.S. citizens may be appointed and must provide current immigrant, non-immigrant or exchange visitor documents.

- **US. Social Security Number.** All VA appointees must have a U.S. social security number (SSN) prior to beginning the pre-employment, on-boarding process at the VA.
- **Selective Service Registration.** Male applicants born after 12/31/1959 must have registered for the Selective Service by age 26 to be eligible for U.S. government employment, including selection as a paid or WOC VA trainee. For additional information about the Selective Service System, and to register or to check your registration status visit <https://www.sss.gov/>. Anyone who was required to register but did not register before the age of 26 will need to apply for a Status Information Letter (SIL) and request a waiver. Waivers are rare and requests will be reviewed on a case by case basis by the VA Office of Human Resources Management. This process can take up to six months for a verdict.
- **Fingerprint Screening and Background Investigation.** All HPTs will be fingerprinted and undergo screenings and background investigations. Additional details about the required background checks can be found at the following website: <http://www.archives.gov/federal-register/codification/executive-order/10450.html>.
- **Drug Testing.** Per Executive Order 12564, the VA strives to be a Drug-Free Workplace. HPTs are not drug-tested prior to appointment, however are subject to random drug testing throughout the entire VA appointment period. You will be asked to sign an acknowledgement form stating you are aware of this practice. See item 8 below.
- **Affiliation Agreement.** To ensure shared responsibility between an academic program and the VA there must be a current and fully executed Academic Affiliation Agreement on file with the VHA Office of Academic Affiliations (OAA). The affiliation agreement delineates the duties of VA and the affiliated institution. Most APA-accredited doctoral programs have an agreement on file. More information about this document can be found at <https://www.va.gov/oaa/agreements.asp> (see section on psychology internships). Post-degree programs typically will not have an affiliation agreement, as the HPT is no longer enrolled in an academic program and the program is VA sponsored.
- **TQCVL.** To streamline on-boarding of HPTs, VHA Office of Academic Affiliations requires completion of a Trainee Qualifications and Credentials Verification Letter (TQCVL). An Educational Official at the Affiliate must complete and sign this letter. For post-graduate programs where an affiliate is not the program sponsor, this process must be completed by the VA Training Director. Your VA appointment cannot happen until the TQCVL is submitted and signed by senior leadership from the VA facility. For more information about this document, please visit <https://www.va.gov/OAA/TQCVL.asp>
- **Health Requirements.** Among other things, the TQCVL confirms that you, the trainee, are fit to perform the essential functions (physical and mental) of the training program and immunized following current Center for Disease Control (CDC) guidelines and VHA policy. This protects you, other employees and patients while working in a healthcare facility. Required are annual tuberculosis screening, Hepatitis B vaccine as well as

annual influenza vaccine. *Declinations are EXTREMELY rare.* Please be aware that this position is required to participate in the seasonal influenza and Coronavirus Disease 2019 (COVID-19) Vaccination programs and are a requirement for all Department of Veterans Affairs Health Care Personnel (HCP). It is a requirement that all HCP receive the COVID-19 vaccination and annual seasonal influenza vaccination or obtain an exemption for medical or religious reasons. Wearing a face mask is required when an exemption has been granted. HCP in violation of these directives may face disciplinary action up to and including removal from federal service.

- **Primary source verification of all prior education and training** is certified via the TQCVL. Training and Program Directors will be contacting the appropriate institutions to ensure you have the appropriate qualifications and credentials as required by the admission criteria of the training program in which you are enrolled.
- **Additional On-boarding Forms.** Additional pre-employment forms include the Application for Health Professions Trainees (VA 10-2850D) and the Declaration for Federal Employment (OF 306). These documents and others are available online for review at <https://www.va.gov/oaa/app-forms.asp>. Falsifying any answer on these required Federal documents will result in the inability to appoint or immediate dismissal from the training program.
- **Proof of Identity per VA.** VA on-boarding requires presentation of two source documents (IDs). Documents must be unexpired and names on both documents must match. For more information visit:
https://www.oit.va.gov/programs/piv/_media/docs/IDMatrix.pdf

Additional information regarding eligibility requirements for appointment as a psychology HPT can be found at the end of this brochure.

Additional information regarding eligibility requirements (with hyperlinks)

- Trainees receive term employee appointments and must meet eligibility requirements for appointment as outlined in VA Handbook 5005 Staffing, Part II, Section B. Appointment Requirements and Determinations.
https://www.va.gov/vapubs/viewPublication.asp?Pub_ID=646&FTYPE=2
- Selective Service website where the requirements, benefits and penalties of registering vs. not registering are outlined: <https://www.sss.gov/Registration/Why-Register/Benefits-and-Penalties>

Additional information specific suitability information from Title 5 (referenced in [VA Handbook/Directive 5005](#)):

(a) *Specific factors.* In determining whether a person is suitable for Federal employment, only the following factors will be considered a basis for finding a person unsuitable and taking a suitability action:

- (1)** Misconduct or negligence in employment;
- (2)** Criminal or dishonest conduct;
- (3)** Material, intentional false statement, or deception or fraud in examination or appointment;
- (4)** Refusal to furnish testimony as required by § 5.4 of this chapter;
- (5)** Alcohol abuse, without evidence of substantial rehabilitation, of a nature and duration that suggests that the applicant or appointee would be prevented from performing the duties of the position in question, or would constitute a direct threat to the property or safety of the applicant or appointee or others;
- (6)** Illegal use of narcotics, drugs, or other controlled substances without evidence of substantial rehabilitation;
- (7)** Knowing and willful engagement in acts or activities designed to overthrow the U.S. Government by force; and
- (8)** Any statutory or regulatory bar which prevents the lawful employment of the person involved in the position in question.

(b) *Additional considerations.* OPM and agencies must consider any of the following additional considerations to the extent OPM or the relevant agency, in its sole discretion, deems any of them pertinent to the individual case:

- The nature of the position for which the person is applying or in which the person is employed;
- The nature and seriousness of the conduct;
- The circumstances surrounding the conduct;
- The recency of the conduct;
- The age of the person involved at the time of the conduct;
- Contributing societal conditions; and
- The absence or presence of rehabilitation or efforts toward rehabilitation.

ADMINISTRATIVE AND FINANCIAL ASSISTANCE

Facility and Training Resources

The intern offices are located within the Mental Health Building. The building was opened July 2008. The interns share a large office where each has his or her own computer and phone access, along with space to write reports and notes. There are two additional offices interns use to see Veterans. These offices are equipped with video taping. Interns have full access to the online VA library as well as the Medical Library located on the grounds. A program support assistant serves mental health and assists interns in scheduling and managing appointments.

Administrative Policies and Procedures

Interns receive a yearly stipend of \$26,579 for 2080 hours. Interns are eligible for health insurance (for self, spouse, and legal dependents) and for life insurance, just as are regular employees. When providing professional services at a VA healthcare facility, VA sponsored interns acting within the scope of their educational programs are protected from personal liability under the Federal Employees Liability Reform and Tort Compensation Act 28, U.S.C.2679 (b)-(d). Interns accrue four (4) hours of sick leave and four (4) hours of annual leave for each full two-week pay period as an intern, for a total of between 96 and 104 hours of each during the year. Five working days of Authorized Absence will be granted for approved professional activity including attendance at educational events, conferences, dissertation defense, and similar activities. To be approved, educational events or conferences must be relevant to practice or research in clinical or counseling psychology. The professional relevance of the activity is judged by the Director of Psychology Training, after consultation with other staff psychologists if necessary. Please note that job interviews do not qualify for Authorized Absence.

SUPERVISION REQUIREMENTS

Supervision: A minimum of four (4) hours of scheduled supervision occurs weekly throughout the internship year. Each intern is assigned to one or two principal staff psychologist supervisors for each rotation. Additional supervision is received from other staff psychologists as arranged by the Director of Training. Details of supervision during each of the standard rotations are presented in the descriptions of rotations in this brochure.

Approximately one hour of individual supervision is provided for every three to six hours of direct patient care. In addition to the expertise of psychologists, that of members of other disciplines is drawn upon for supervision in special interest activities.

Supervision Training Group: A weekly two-hour Supervision Training group is attended by all interns. In the Supervision Training group, interns learn the practice of supervision by supervising each other on one psychotherapy case (assigned through the group) and, when available, supervising a clinical social work intern. This training is conducted under the guidance of one of the psychology staff and the postdoctoral fellow.

RECORD MAINTENANCE

All trainee records are kept by the current Training Director in perpetuity. These records must be maintained for upwards of 30 to 40 years; basically for the professional life of the psychologist.

The records are kept in a locked filing cabinet located in the Psychology Training office.

The process began in 2019 to ensure records are also kept in electronic form in a folder on a secure drive of the SAVAHCS facility.

These records must be utilized in credentialing and verification of the internship for all trainees.

SUCCESSFUL COMPLETION OF INTERNSHIP

Interns are expected to meet the following requirements:

2000 Hours per Year: The internship training program requires one year of full-time training to be completed in no less than 12 months. Interns must complete 2000 hours of supervised on-duty time during the internship year.

Patient Contact: Each intern is expected to average 10-12 hours each week in direct patient contact. It is expected that these minimums typically will be exceeded. For this requirement, direct patient contact includes only “face-to-face” contact with patients for any type of group or individual therapy, psychological testing, assessment activities or patient education. Successful completion of the internship requires a minimum of 500 hours of direct patient contact.

Psychological and Assessment: Interns must complete a minimum of 6 comprehensive psychological evaluations. These assessments must be based on data integrated from multiple sources and must include written reports with diagnostic impressions and recommendations. Assessments based solely on interviews or single tests do not meet this requirement.

Didactic Training: Interns are required to attend the required didactic seminars on a weekly basis. Required seminars include: Weekly Didactic Seminar; Group Supervision Seminar; and monthly Diversity VTEL. Rotations may require specific didactic seminars, in addition to the above.

Competence in Clinical Activities: These are the minimum thresholds for Achievement for Expected Competencies, located in the *Psychology Intern Competency Assessment Form*

Goal for intern evaluations done prior to 12 months (Mid-year, rotations 1-3)
Intermediate; should remain a focus of supervision. Routing supervision of most activity.
Common rating throughout internship.

Only areas where the intern has no prior experience should be rated **R** (remedial), with most cases indicating that a remediation plan is needed.

In the area of *Knowledge of Ethics and Law*, Intern receives a rating of **I** or higher.

Goal for intern evaluations done at 12 months (final evaluation)

All competency areas will be rated at level of competence of **E**.

No competency areas will be rated as **I** or **R**.

In the area of *Knowledge of Ethics and Law*, Intern receives a rating of **E**.

PERFORMANCE EVALUATION SCHEDULE

Initial Informal Evaluation: Prior to the beginning of the internship, each intern completes a short self- assessment regarding their knowledge and practice of empirically supported/based treatments, strengths, weaknesses, and goals for internship. Then, at the beginning of internship, interns' performance is observed by their supervisors in order to assess training needs. Areas of strength are also identified. Supervisors then share these observations informally, utilizing a checklist to ensure accuracy, with each other in a staff meeting approximately one month after commencement of the first rotation and make recommendations to interns as indicated.

Rotation Evaluation: The Competency Evaluation is completed during the two last weeks of each rotation. It involves written evaluation of the intern's progress and performance during the rotation. The intern also evaluates the supervision received as well as the rotation itself. Both intern and supervisor exchange evaluations in order to improve the quality of supervision and facilitate the professional development of the intern. This also provides specific feedback about how well the rotation is meeting expectations for training. Interns can give these evaluations to the Director of Training, if preferred.

Mid-Term Evaluation: At the end of the second rotation the entire staff meets to formally evaluate each intern's progress according to specific criteria that have been provided in written form to interns during the first week of internship. The Director of Psychology Training communicates the results of this evaluation to each intern individually. The evaluation serves to establish goals for the second half of the internship. A copy of this evaluation is sent to the academic director of clinical or counseling training.

Final Evaluation: This follows the same format as the Mid-Term evaluation and occurs during the final month of the internship. The Director of Psychology Training completes a final written evaluation of each intern, and after the results have been discussed with the intern a copy of this is sent to the academic director of clinical/counseling training. Each intern completes a written evaluation of his or her internship experiences as well, including recommendations for change, and this is submitted anonymously to the Director of Psychology Training. Results of this are discussed with staff, after the intern completes the internship.

INTERNSHIP GRADUATE FEEDBACK POLICY

The SAVAHCS Psychology Internship program believes in the use of feedback data to help improve the program. This is seen as a continuous process regarding feedback and therefore we seek this information from graduates of the program. Data, regarding the internship performance, must be kept for 7 years (the length of our current accreditation period).

The Graduate Survey form is sent by e-mail. Data is collected at the following time intervals from graduates of the internship program:

- 1 year
- 2 year
- 3 year
- 5 year
- 7 year

GRIEVANCE PROCEDURES

INTERN GRIEVANCE AND COMPLAINT PROCEDURES

We believe most problems are best resolved through face-to-face interaction between intern and supervisor (or other staff), as part of the on-going working relationship. Interns are encouraged to first discuss any problems or concerns with their direct supervisor. In turn, supervisors are expected to be receptive to complaints, attempt to develop a solution with the intern, and to seek appropriate consultation. If intern-staff discussions do not produce a satisfactory resolution of the concern, a number of additional steps are available to the intern.

Grievances are defined as:

1. Violations of ethical conduct or professional standards.
2. Harassment and/or discrimination.
3. Matters of serious concern that remains unresolved after direct exchange between the intern and involved staff member(s).

This is an internal process to the psychology training program, as required by the American Psychological Association. As such, it is unrelated to Human Resources and their grievance procedures.

1. Informal mediation. Either party may request the Training Director to act as a mediator, or to help in selecting a mediator who is agreeable to both the intern and the supervisor. Such mediation may facilitate a satisfactory resolution through continued discussion. Alternatively, mediation may result in recommended changes to the learning environment, or a recommendation that the intern change rotations in order to maximize their learning experience. Interns may also request a change in rotation assignment. Changes in rotation assignments must be reviewed and approved by the Training Committee.

2. Formal grievance. In the event that informal avenues of resolution are not successful, or in the event of a serious grievance, the intern may initiate a formal grievance process by sending a written request for intervention to the Training Director. Grievances are to be submitted in writing and must include a statement of the grounds for the grievance, the date(s) of the incident(s) constituting the grounds for the grievance, and the name of the psychologist against whom the grievance is being submitted. The written grievance should include a recommended course of action for resolution of the grievance. The written grievance shall be submitted to the Director of Psychology Training or, if that individual is the object of the grievance, to the Lead Psychologist. Of note, the intern will be removed from supervision with the supervisory psychologist, whom the grievance is against, while this process is undertaken.

- a. The Training Director will notify the Lead Psychologist of the grievance and call a meeting of the Training Committee to review the complaint. The intern and supervisor will be notified of the date that such a review is occurring, and given an opportunity to provide the Committee with any information regarding the grievance
- b. Based upon a review of the grievance, and any relevant information, the Training Committee will determine the course of action that best promotes the intern's training

experience. This may include recommended changes within the placement itself, a change in supervisory assignment, or a change in rotation placement.

- c. The intern will be informed in writing of the Training Committee's decision, and asked to indicate whether they accept or dispute the decision. If the intern accepts the decision, the recommendations will be implemented. If the intern disagrees with the decision, they may appeal to the Lead Psychologist. The Lead Psychologist will render the appeal decision, which will be communicated to all involved parties, and to the Training Committee.
- d. In the event that the grievance involves any member of the Training Committee (including the Training Director), that member will excuse himself or herself from serving on the Training Committee due to a conflict of interest. A grievance regarding the Training Director may be submitted directly to the Lead Psychologist for review and resolution.
- e. Any findings resulting from a review of an intern grievance that involve unethical, inappropriate or unlawful staff behavior will be submitted to the Lead Psychologist for appropriate personnel action.
- f. These procedures are not intended to prevent an intern from pursuing a grievance under any other mechanisms available to VA employees, including EEO, or under the mechanisms of any relevant professional organization, including APA or APPIC. Interns are also advised that they may pursue any complaint regarding unethical or unlawful conduct on the part of psychologists licensed in Arizona by contacting the office of the Board of Psychology. In order to ensure that negative repercussions do not accrue to an aggrieved intern, an EEO counselor will be selected to monitor the fairness with which the intern is treated throughout the remainder of the internship year, should this additional process become necessary. The counselor will have the responsibility and authority to raise issues of inequity and unfair treatment with the Director of Psychology Training and to seek to have the unfair or inequitable practices halted and redressed.
- g. The policy stated herein applies only to grievances filed against staff of the Psychology Internship program. Grievances against other employees of SAVAHCs are to be filed according to the Equal Employment Opportunity Committee grievance procedures applicable to this medical center. Grievances shall be initiated by the intern within the internship year, which commences on the day that the intern is officially processed in as an employee of SAVAHCs and continues for 52 weeks following that date or until the intern is officially no longer an employee of SAVAHCs.

DUE PROCESS POLICY

The following policies reflect our basic philosophy in our training efforts. First, interns are trained with dignity and respect and they are afforded as much professional responsibility and autonomy as is practical and judicious. Second, just as we expect staff to function professionally with interns, so too do we expect that interns will form respectful and productive professional relationships with their supervisors. Finally, training staff and interns alike are responsible for being direct in expressing concerns and suggesting avenues for solving problems. The third tenet is that most interpersonally-oriented problems should be manageable through open exchange among the relevant parties and solved at an informal level.

This section provides a definition of problematic intern performance and how these situations are handled by the program, as well as a discussion of due process.

The internship program follows due process guidelines to assure that decisions are fair and nondiscriminatory. During their first week as part of the orientation process, interns are given the Policies and Procedures manual and this material is reviewed with the Director of Training.

Problematic Behaviors

Problematic behaviors are broadly defined as those behaviors that disrupt the intern's professional role and ability to perform required job duties, including the quality of: the intern's clinical services; their relationships with peers, supervisors, or other staff; and their ability to comply with appropriate standards of professional and/or ethical behavior. Problematic behaviors may be the result of the intern's inability or unwillingness to a) acquire professional standards and skills that reach an acceptable level of competency, or b) to control personal issues or stress.

An intern judged by any staff psychologist as failing to meet program expectations in any of the three areas of professional functioning identified above will be informed of this judgment as early as possible (no later than mid-rotation).

PROCEDURES FOR RESPONDING TO PROBLEMATIC PERFORMANCE AND/OR PROBLEMATIC CONDUCT

It should be noted that every effort is made to create a climate of access and collegiality within the service. The Director of Training is actively involved in monitoring the training program and frequently checks informally with interns and supervisors regarding interns' progress and potential problems. In addition, Intern-Director meetings are held once a month to provide another forum for discovery and resolution of potential problems. Interns are also encouraged to raise concerns with the Director of Training as they arise. It is our goal to help each intern reach his/her full potential as a developing professional. Supervisory feedback that facilitates such professional growth is essential to achieving this goal.

We follow a stepped system of intervention. This is meant to deal with problematic performance or conduct at the lowest level first. We have found that rarely an intern is seen as lacking the competence for eventual independent practice due to a serious deficit in skill or knowledge, or due to problematic behaviors that significantly impact their professional functioning. The stepped system of intervention includes the following interventions:

- 1) Informal or Performance Improvement Plan
- 2) Formal Remediation Plan
- 3) Probation (may be considered at any time, with or without formal remediation)
- 4) Dismissal

1. INFORMAL OR PERFORMANCE IMPROVEMENT PLAN

In the situation when it is recognized that an intern needs performance improvement, a competency assessment form should be filled out **immediately**, prior to any deadline date for evaluation, and shared with the intern. In order to allow the intern to gain competency and meet passing criteria for the rotation, these areas must be addressed *proactively*, and a performance improvement plan needs to be devised and implemented promptly

Informal recommendations for performance improvement will be made to the intern initially by the staff member who has judged the intern's performance to be deficient. These concerns are initially dealt with in the supervision dyad. If, in the opinion of that staff psychologist, the intern fails to respond to these recommendations adequately, specific written recommendations for performance improvement will be provided to the intern. The Director of Training may be brought in to help with the process. A time frame will be established during which the intern will be expected to make the recommended improvements. The intern will be provided with maximum support of the staff psychologist, and the Director of Training in making these recommended improvements.

Specific recommendation examples to the intern may include:

1. A change in supervision:
 - a. Increasing the frequency.
 - b. Changing the format (increase tape review, conduct co-therapy, etc.)
 - c. Changing the focus (targeting specific client behaviors, etc.)
2. Reducing the size of the intern's caseload and/or range of responsibilities in order to allow more time for careful planning, case review, etc.
3. Decreasing the complexity of the clinical problems represented in the intern's caseload.
4. In urgent cases, if an intern identifies a personal issue that interferes with performance or training, referral is made to the Employee Assistance Program for immediate assistance.

In most cases, such recommendations will be sufficient to motivate the intern to make the required improvements in professional functioning.

FAILURE TO CORRECT PROBLEMS

Behaviors reach a problematic level when they include one or more of the following characteristics:

- The intern does not acknowledge, understand, or address the problem
- The problem is not merely a deficit in skills, which could be rectified by further instruction and training
- The intern's behavior does not improve as a function of feedback, remediation, effort, and/or time
- The professional services provided by the intern are negatively affected
- The problem affects more than one area of professional functioning

- The problem requires a disproportionate amount of attention from training supervisors

Some examples of problematic behaviors include:

- Engaging in dual role relationships
- Violating patient confidentiality
- Failure to respect appropriate boundaries
- Failure to identify and report patients' high-risk behaviors
- Failure to complete written work in accordance with supervisor and/or program guidelines
- Treating patients, peers, and/or supervisors in a disrespectful or unprofessional manner
- Plagiarizing the work of others or giving one's work to others to complete
- Repeated tardiness
- Unauthorized absences

NOTE: this list is not exhaustive. Problematic behaviors also include behaviors discouraged or prohibited by APA's Ethical Guidelines and VA policies and procedures, as outlined during orientation.

2. FORMAL REMEDIATION PLAN

Once an intern's professional activity and competency level has been judged to reach a problematic level and prior attempts at performance improvement have failed, they will be notified by the Director of Psychology Training that they have been referred for a formal remediation plan. This is part of the formal process of dealing with professional competency problems.

The Director of Training has a responsibility to explore thoroughly and to document the intern's problematic behaviors, with both supervisor and intern. Questions to be asked in this process include:

1. What are the actual behaviors that are of concern and where are they included in the competency evaluation criteria?
2. How and in what settings have these behaviors been evident?
3. What are the negative consequences of these behaviors for the Veterans Administration Medical Center and its patients and clients?
4. Who observed the behaviors in question?
5. Who or what was affected by these behaviors and in what way?
6. What is the frequency of the behaviors?
7. Has the intern been informed fully of the problematic nature of the behaviors? If so, how did their respond to this information?
8. Has the feedback regarding this behavior been documented? In what format?
9. How serious is the behavior on the continuum of ethical and professional behaviors?

The intern and supervisor are informed by the Director of Training that they will need to make a written statement about what has been done to correct the concerns about competency and/or behavior. The Director of Training will meet with the intern to discuss the concerns raised and encourage them in their written response. Both of these written statements will be forwarded to the Training Committee. In addition, the Director of Training writes a statement regarding their evaluation of the issues and summary of what they have learned. The Director of Training is expected to consult with OAA, APPIIC, and the Director of Education, as well as other agencies as deemed necessary.

The Director of Training calls for a meeting of the Training Committee to review statements from the supervisor and intern, as well as any supporting documentation.

Training Committee—The Training Committee consists of 5 to 7 psychologists that are actively involved in training, including the externship, internship, and post-doctoral fellowship. The Training Committee meets monthly to discuss training issues and trainee performance.

Training Committee Meeting. In this process of addressing training needs, the Training Committee meets. The intern and supervisor are invited to attend. This invitation must come no later than 3 days prior to the meeting. The Director of Clinical Training of the intern's graduate program will be notified of this concern and consulted regarding input about the problem and remediation. The Training Committee Meeting includes:

- hearing concerns from the supervisor and intern
- review of documentation
- determine the need for a Formal Remediation Plan
- determine the need to place the intern on probation

Decisions may include that there is 1) no need for a Formal Remediation plan; 2) a Formal Remediation Plan is developed; 3) a need for suspension of direct service activities; 4) and/or the intern is placed on probation. Each of these decisions must be explained and documentation provided as needed.

Formal Remediation Plan– This is a written statement issued to the intern which includes the following information:

- A description of the problematic behavior(s)
- Documentation that the Training Committee is aware of and concerned about the problematic behavior(s) and has discussed these with the intern
- Specific timelines for conclusion, as determined by the Training Committee
- Documentation that intern's graduate program DCT has been notified
- A remediation plan to address the problem(s) within a specified time frame. Remediation plans set clear objectives and identify procedures for meeting those objectives. Possible remedial steps include but are not limited to:
 - o Increased level of supervision, either with the same or other supervisors
 - o Additional readings
 - o Changes in the format or areas of emphasis in supervision
 - o Change in rotation
 - o Recommendation or requirement of personal therapy, including clear objectives which the therapy should address
 - o Recommendation or requirement for further training to be undertaken
 - o Recommendation or requirement of a leave of absence (with time to be made up at no cost to the institution)

The Formal Plan is then presented to the intern by the Training Committee and Training Director. Any additional concerns are discussed in this meeting. Any amendments to the original plan are made and then communicated to the intern's academic Director of Clinical/Counseling Training. In the case of an intern who is given probationary status, this action will be communicated to the academic graduate program immediately. In addition, communication with that program will occur at each necessary subsequent stage in the process of dealing with the intern's professional competency problems. Academic program staff will be invited to participate in the process of dealing with the intern.

3. PROBATION

Probation Notice –A trainee may be placed on probation, by the Training Committee, when: (1) their performance fails to meet the standards set forth in their Formal Remediation Plan, (2) they have not responded satisfactorily to previous interventions, and/or (3) the nature/severity of the problem warrants an immediate action. Probation can be initiated at any time during the course of the training year, if appropriate. Some examples of triggers for immediate probationary action include, but are not limited to, violation of veteran confidentiality, practicing outside of competence areas without proper supervisory input, actions or failure to take actions that may result in veteran harm, or problematic boundaries with veterans. This is a time limited, remediation-oriented, more closely supervised training period. The purpose is to assess the ability of the intern to complete the internship and to return the intern to a more fully functioning state. The intern will be given a written statement that includes the following documentation:

- A description of any previous efforts to rectify the problem(s)
- Specific behaviors that are of concern
- Notification of and/or consultation with the intern's graduate program regarding further courses of action
- Specific recommendations for resolving the problem(s)
- A specified time frame for the probation during which the problem is expected to be rectified and procedures for assessing this.

Suspension of Direct Service Activities- This requires a determination that the welfare of the intern's client or supervisee has been jeopardized. Therefore, direct service activities will be suspended for a specified period as determined by the Training Committee in consultation with the Director of Training. At the end of the suspension period, the intern and supervisors involved will meet with the Training Committee to assess the intern's capacity for effective functioning and determine when direct service can be resumed.

The intern and supervisor will report to the Training Committee on a regular basis, as specified in the Formal Remediation Plan (at least twice during a 3-month rotation).

At the conclusion of the time period in the Formal Plan/Probation Notice, the Training Committee, Training Director, Staff Supervisor, and intern will meet again to discuss progress toward the goals set out in the plan. Once the recommended improvements in functioning have been made to the satisfaction of (a) the staff member initially reporting them, (b) the Training Committee, (c) the Director of Training, or (d) the Lead Psychologist (if the Director of Training has been recused), the formal remediation plan will be voted on by the Training Committee. A majority vote is needed to resolve and remove an intern from Formal Remediation and/or Probation.

ILLEGAL, UNETHICAL, or EGREGIOUS BEHAVIOR

Illegal, unethical, or egregious conduct by an intern should be brought to the attention of the Training Director in writing. Any person who observes such behavior, whether staff or intern, has the responsibility to report the incident.

- The Training Director, the Training Committee, the supervisor, and the intern may address infractions of a minor nature. A written record of the complaint and action become a permanent part of the intern's file.
- Any significant infraction or repeated minor infractions must be documented in writing and submitted to the Training Director, who will notify the intern of the complaint. The Training Director will call a meeting of the Training Committee to review the concerns, after providing notification to all involved parties, including the intern and Director of Clinical Training of the graduate program. All involved parties will be encouraged to submit any relevant information that bears on the issue and invited to attend the Training Committee meeting(s).

Examples of significant infractions include but are not limited to:

1. Violation of ethical standards for the discipline, for the training program, or for government employees.
 2. Violation of VA regulations or applicable Federal, state, or local laws.
 3. Disruptive, abusive, intimidating, or other behavior that disturbs the workplace environment or that interferes or might reasonably be expected to interfere with veteran care. Disruptive behaviors include profane or demeaning language, sexual comments or innuendo, outbursts of anger, throwing objects, serious boundary violations with staff or veterans, inappropriate health record entries, and unethical, illegal, or dishonest behavior.
 4. Behavior that may result in harm to the veteran or veteran's family, by consensus of the Training Committee.
- The Training Director may seek advisement from appropriate Medical Center resources, including District Counsel, as well as the American Psychological Association, VA Office of Academic Affiliation, and Association of Psychology Postdoctoral and Internship Centers.
 - As described in the previous section on remediation of problematic performance and/or conduct, at any stage of the process, the intern may request assistance and/or consultation outside of the program and utilize the resources listed in the appendix.
 - Following a careful review of the case, the Training Committee may recommend several options, as they deem fit. They may determine that the infraction is remediable and begin the process of Formal Remediation and/or consider probation. They may decide that it is serious and recommend dismissal of the intern. The third option would be determining that the infraction was not significant, and the intern is returned to training. Recommendation of a probationary period or termination shall include the notice, hearing and appeal procedures described in those sections.
 - The Training Committee prepares a report regarding the results and their recommendations. They, along with Training Director, meet with intern to review results and recommendations.

4. PROCEDURES FOR DISMISSAL AND APPEAL

SAVAHCS
Psychology Internship Program
Policies and Procedures
Revised September 2021

Page 23 of 25

When the staff psychologist(s) who initially reported an intern's failure to meet program expectations and professional competency, the Director of Psychology Training, and the Training Committee, unanimously agree that all reasonable efforts to rectify the intern's deficits have been made and the intern is unable or unwilling to alter their behavior, then consideration of termination of the intern's participation in the internship program is appropriate.

Termination – if an intern has not improved sufficiently under the conditions specified in the Formal Plan and/or an Illegal/Unethical/Egregious behavior has been determined to warrant dismissal, termination will be discussed by the full Training Committee, Training Director, as well as with the intern's graduate program, VA OAA, and the facility HR Chief. The Training Committee may request information from the intern or other relevant parties. An intern may be given the option to choose to withdraw from the program rather than be terminated.

The Training Committee will meet with the intern, Training Director, and supervisor. The final decision regarding the intern's ability to successfully complete internship is made by the Training Committee, after consideration of all materials related to his process. After reviewing all the available information, the Training Committee may choose one of the following actions.

1. Decision is made to take no action
2. Decision is made to return intern to Formal Remediation
3. Decision is made to continue with dismissal

This determination will occur no later than the May Training Committee meeting (only exception would be illegal, unethical, or egregious behavior is found). If it is decided to terminate the internship, the intern will be informed in writing by Director of Training that he/she will not successfully complete the internship. The intern and his/her graduate program will be informed of the decision in writing no later than May 15th.

The Director of Psychology Training will take the following steps before the intern is informed of their dismissal.

1. Review the SAVAHCs institutional implications of the decision from legal, personnel, budgetary, and other relevant perspectives. Institutional policies and procedures applicable to dismissal of an individual in the employment category covering Psychology Intern must be followed.
2. Review the proposed action and the corresponding written statements in consultation with the Chief Executive Officer of SAVAHCs or their designee, the Chief of Human Resources Management, VAMC legal counsel, the intern's sponsoring academic department, the Association of Psychology Postdoctoral and Internship Centers, and the American Psychological Association.
3. Send a letter to the intern reiterating the problematic behavior in question, the intern's lack of adequate response to requests for change, and the reasons for dismissal. A similar letter will be prepared for the academic department of the intern.
4. Decide how and when the intern's dismissal will take place. It is unlikely that they will have a clinical caseload, and the departure must be planned in such a way that it causes a minimum of disruption or difficulty for the intern and their clients. During any period between notification of dismissal and the intern's actual departure from the program, any responsibilities the intern continues to fulfill will be explicitly described in writing and will be different from those of the other interns.
5. Provide the intern an opportunity to appeal the decision to dismiss. This appeal process will conform to due process guidelines applicable at SAVAHCs. If no appeal is initiated, all parties involved will be informed of the exit date of the intern.

The Training Committee and Training Director may confer to determine how the dismissed intern's peer colleagues will be briefed by the Training Director. In all cases, peer colleagues will be provided with only the minimally necessary information to aid their understanding of the situation.

APPEAL OF DECISION TO DISMISS AN INTERN

From the time that the impaired intern is informed of the decision to dismiss them from the internship program, they will have one week to initiate an appeal of that decision. The appeal shall be submitted in writing to the Director of Psychology Training. The appeal shall include a request that a Board of Appeal be established as expeditiously as possible. Within ten days of receipt of the request for appeal, the Lead Psychologist shall form a board consisting of themselves (or a chosen representative), one person selected by the intern to be dismissed and the Training Director of the Phoenix VA, or their representative.

The Director of Training will present the position of the Training Committee to the board. The intern, together with any counsel they may choose, will present the appeal.

In closed session, the Board of Appeal will review the facts of the case as presented by the Director of Psychology Training and the intern. The board will be authorized to return one of three possible decisions:

1. To support the intern's dismissal.
2. To reinstate the intern in the internship program with no conditions.
3. To deny immediate dismissal but recommend a course of remedial action/training to be completed by the intern by a specified date. If the recommended action or training is not completed by the specified date, dismissal will proceed. The board shall have responsibility for monitoring the intern's progress in meeting its recommendations.

If dismissal is upheld, the Lead Psychologist will direct HR to suspend the intern's appointment. If continuation of training is determined, the Director of Training, supervisors, and the intern are responsible for negotiating an acceptable training plan.

If the above process fails to resolve the situation, the intern or the Lead Psychologist can take further action in accordance with SAVAHCs HR policies regarding due process and employee dismissal. During the interval between written notification to the intern that they will be dismissed and completion of deliberation by the Board of Appeal, the intern is likely to be relieved of all or part of their responsibilities within the Psychology Programs.

Interns are free to discuss any disagreements with the SAVHCS HR service or EEOC staff for formal action above the level of the Psychology training program.

All documentation related to the formal remediation and due process becomes part of the intern's permanent file with the Psychology Internship program. These records are maintained by the Director of Training and kept in secure, locked cabinets.

At any stage of the process, the intern may request assistance and/or consultation. Interns may also request assistance and/or consultation outside of the program. Resources for outside consultation include:

- **Association of Psychology Postdoctoral and Internship Centers (APPIC)**

APPIC has established both an [Informal Problem Consultation](#) process and a [Formal Complaint](#) process in order to address issues and concerns that may arise during the internship training year.

<http://appic.org/Problem-Consultation>

- **APA Office of Program Consultation and Accreditation:**

750 First Street, NE
Washington, DC 20002-4242
(202) 336-5979
<http://www.apa.org/ed/accreditation>

- **VA Office of Resolution Management (ORM) –**

Department of Veterans Affairs
Office of Resolution Management (08)
810 Vermont Avenue, NW, Washington, DC 20420
Toll Free 1-888- 737-3361

<http://www4.va.gov/orm/>

This department within the VA has responsibility for providing a variety of services and programs to prevent, resolve, and process workplace disputes in a timely and high quality manner. These services and programs include:

Prevention: programs that insure that employees and managers understand the characteristics of a healthy work environment and have the tools to address workplace disputes.

Early Resolution: ORM serves as a resource for the resolution of workplace disputes. ORM has been designated as the lead organization for workplace alternative dispute resolution (ADR) within VA. This form of mediation available to all VA employees. Mediation is a process in which an impartial person, the mediator, helps people having a dispute to talk with each other and resolve their differences. The mediator does not decide who is right or wrong but rather assists the persons involved create their own unique solution to their problem. VA mediators are fellow VA employees who have voluntarily agreed to mediate workplace disputes. They are specially trained and skilled in mediation techniques and conflict resolution. In electing to use mediation, an employee does not give up any other rights.

Equal Employment Opportunity (EEO) Complaint Processing

- **Independent Legal Counsel**

Please note: union representation is not available to interns as they are not union members under conditions of their VA term-appointment.